REMARKS

Claims 1-20 are pending and rejected by the examiner. Claims 1, 13, 17 and 19 are independent claims.

The examiner uses Wical to reject claims 1-4, 8-10 and 13-20 as having been anticipated.

Applicant's claims 1, 13, 17 and 19, as amended, recite "converting the query to a query concept," or similar language. Wical neither describes nor suggests at least this quoted claim feature.

The examiner argues that the above feature is disclosed in Wical at col. 9, lines 34-53 and at col. 9, line 64 through col. 10, line 4 (reproduced below for the convenience of the examiner):

> In general, the query term processing 205 utilizes the definitional characteristics in the lexicon to determine whether to generate a lower case term from an upper case term when input as a query term. In one embodiment, the query term processing 205 generates lower case terms if the corresponding upper case term is both a common noun and a content carrying word. Names, which are proper nouns, are not converted. For query terms converted, both the upper case term and the lower case term are used to process the query. Although certain upper case terms are converted to lower case terms, the original upper case query term is considered more relevant to the original query than the lower case term.

> As described fully below, the concept query processing 200 and factual query processing 210 reference the knowledge base 155 and document theme vectors 160 to generate a response to the user query. The query processing block 175 outputs retrieval information to a screen module 230. In general, the screen module 230 processes the retrieval information to display the retrieval information in a predetermined form.

> In response to the query, the search and retrieval system 100, utilizing the knowledge base 155, identifies terminology related to the query terms. Specifically, for this example, the search and retrieval system 100 identifies terminology shown in blocks 620, 630, and 645 of FIG. 3. In general, the knowledge base 155 is used to identify terminology that has a lexical, semantic, or usage association with the query terms.

Clearly, the above fails to describe or suggest applicant's quoted claim feature.

As is known to those skilled in this art, there are two high level components to any search, i.e., a query component and a database(s) component. In general terms, a search process receives the first component, i.e., the query, and uses the first component to match elements in the second component, i.e., the database.

Wical uses a linguistic engine, not to convert the query to a query concept, but to process documents residing in the database, which Wical refers to as content processing:

> The linguistic engine 700 receives, as input, the document set 130, and generates, as output, the structured output 710.he linguistic engine 700, which includes a grammar parser and a theme parser, processes the document set 130 by analyzing the grammatical or contextual aspects of each document, as well as analyzing the stylistic and thematic attributes of each document. Specifically, the linguistic engine 700 generates, as part of the structured output 710, contextual tags 720, thematic tags 730, and stylistic tags 735 that characterize each document. (Col. 27, lines 44-52)

Clearly, no query converting is disclosed here, only document processing; these Wical documents include content and reside in one or more databases. Wical is all about content residing in documents that are the target of a search:

> The search and retrieval system of the present invention utilizes a rich and comprehensive content processing system to accurately identify themes that define the content of the source material (e.g., documents). In response to a search query, the search and retrieval system identifies themes, and the documents classified for those themes. In addition, the search and retrieval system of the present invention draws inferences from the themes extracted from a document. (Col. 4,line 23-30)

Wical may relate a query to a theme but fails to convert a query to a query concept:

> In general, the search and retrieval system 100 receives, as input, user queries, and generates, as output, search results which, depending upon the mode of operation, identifies categories and documents. (Col. 5, lines 48-52)

Wical concentrates on the documents to achieve search results:

> In general, the content processing system 110 analyzes the thematic, contextual, and stylistic aspects of the documents 130, and generates a document theme vector 160. The document theme vector 160 identifies themes for each individual document, as well as a theme strength corresponding to each theme. In addition to identifying document themes, the content processing system 110 attempts to classify each theme. Specifically, the content processing system 110 uses a classification criteria, which in one embodiment includes categories arranged in a hierarchical structure, to classify document themes in one or more categories. The classifications for document themes are identified in the document theme vector 160. (Col. 5, line 63 to col. 6. line 8)

Wical does disclose a form of query processing:

> The query processing 175 receives, as input, user queries, and generates, as output, responses to queries based on the mode of operation. The query processing 175 accesses documents 130, document theme vector 160, and knowledge base 155 to formulate a response to the user query. (Col. 7, lines 62-67)

As can be seen above, Wical's query processing accesses documents, document theme vectors and a knowledge base to respond to a query. This is still very different from converting the query to a query concept. Accordingly, claims 1, 13, 17 and 19 are not anticipated by Wical.

The examiner uses Wical and Braden-Harder to reject claims 5-7, 11 and 12 as having been obvious.

Claim 1, as amended, includes "converting the query to a query concept" and is not rendered obvious by the combination of Wical and Braden-Harder. Claims 5-7, 11 and 12 depend upon, and add further limitations to, claim 1. Accordingly, claims 5-7, 11 and 12 are not rendered obvious by the combination of Wical and Braden-Harder.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

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